

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

vs.

TANMAYA KABRA,

Defendants

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Criminal Action No. 19-cr-10335

MOTION TO REQUEST RULE 11 HEARING

Now comes the Defendant Tanmaya Kabra (“Kabra”), by and through his undersigned attorneys, and moves this Honorable Court to schedule this matter for a Rule 11 hearing at its earliest convenience. Kabra requests that he and his undersigned attorneys appear in person. He is prepared to plead guilty to four counts of wire fraud in violation of 18 U.S.C. § 1343 as set forth in a Superseding Information to be filed by the U.S. Attorney’s Office, pursuant to the terms of a plea agreement.

Undersigned counsel conferred with Assistant United States Attorney Christopher Looney, who advised he assents to the request herein.

Respectfully submitted,

TANMAYA KABRA

By his attorneys,

/s/ Michael J. Connolly

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Dated: March 12, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document filed through the ECF system will be sent electronically by the ECF system to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 12, 2021.

/s/ Michael J. Connolly

Michael J. Connolly